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8 *Panasonic Corporation, Panasonic Corporation of*  
9 *North America, and MT Picture Display Co., Ltd*

10  
11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **OAKLAND DIVISION**

14  
15 IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

16  
17 This document relates to:  
All Indirect Purchaser Actions

Case No.: 07-cv-05944-JST

MDL No. 1917

**DECLARATION OF KEVIN B. GOLDSTEIN**  
**IN SUPPORT OF MOTION FOR SANCTIONS**  
**PURSUANT TO FED. R. CIV. P. 11 AND 28**  
**U.S.C. § 1927**

1 I, Kevin B. Goldstein, declare:

2 1. I am an attorney with Winston & Strawn LLP, attorneys for Defendants Panasonic  
3 Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.), Panasonic Corporation of North  
4 America, and MT Picture Display Co., Ltd.,<sup>1</sup> in this action. I am a member of the bar of the  
5 State of New York, the State of Illinois, and the District of Columbia, and admitted by this Court  
6 *pro hac vice* for purposes of this lawsuit (ECF No. 1403). I make this Declaration in support of  
7 Intervenor-Proposed Defendants' Motion to Sanctions Pursuant to Federal Rule of Civil  
8 Procedure 11 and 28 U.S.C. § 1927, and have personal knowledge of the facts set forth below.  
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10 2. Attached as Exhibit A is a true and correct copy of email correspondence, and  
11 attachments thereto, on October 10, 2022, between myself, Robert Bonsignore, and Joseph  
12 Alioto.  
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14 3. Attached as Exhibit B is a true and correct copy of email correspondence, and  
15 attachments thereto, culminating on November 30, 2022, between myself, Robert Bonsignore,  
16 and Joseph Alioto.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed this 22nd day of December, 2022, in Chicago, Illinois.  
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Kevin B. Goldstein  
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27 <sup>1</sup> MT Picture Display Co., Ltd. has been dissolved and completed final liquidation proceedings in Japan  
28 on May 23, 2019.